

The Honorable Ricardo S. Martinez

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

PETER AND RENEE NORRIS,
individually and on behalf of the marital
community,

Plaintiffs,

vs.

STATE FARM FIRE AND CASUALTY
COMPANY, an admitted insurer,

Defendant.

No. 2:14-cv-01453-RSM

**DECLARATION OF GREG GUILLEN, P.E.
IN SUPPORT OF NORRIS' MOTION FOR
SUMMARY JUDGMENT**

I, Greg Guillen, declare:

1. I am a principal with CG Engineering, working out of its office in Edmonds, WA. CG Engineering operates in eleven states, providing civil, structural and land development consulting services. I am a licensed structural engineer in Washington with over 30 years of experience in structural design and project management. During my career I have been involved in structural design and repair of hundreds of foundations and foundation systems. This work has included extensive experience with undermined foundations such as at the Norris home.

1 2. CG Engineering and Nelson Geotechnical Associates did make geotechnical and
2 structural engineering evaluations and provided designs for the emergency stabilization and
3 permanent repairs. I worked with Khaled Shawish, P.E., a principal, and Lee Bellah, a licensed
4 geologist, both with Nelson on the Norris Project. Mr. Shawish is an expert in geotechnical
5 engineering who I have worked with on many projects in the past. I relied on Nelson's
6 geotechnical observations, opinions and advice. Attached as Exhibit A is a true and correct
7 copy of an April 21, 2014 letter from Nelson to Peter Norris, which I was copied on. This letter
8 summarizes the geotechnical engineering evaluation and the emergency stabilization and
9 permanent repair recommendations, including the structural work I recommended.

10 3. The Norris residence is on a steep slope above the Wenatchee River. The foundation
11 was supported by footings as were the exterior decks and patios. The massive release of water
12 washed away the soil under the southeast corner of the foundation, leaving it cantilevered out
13 hanging in the air. The footings for that corner were there, but offered no structural support.
14 The footings for the deck and patios were swept away down the hill; destroying the deck and
15 patios. The destruction of the footings caused damage to the southeast corner of the roof as it
16 started to cave in.

17 4. The home was uninhabitable and in my opinion had a significant risk of portions of
18 the home cracking and moving downslope. Dead loading increased this risk and was such a
19 concern I recommended all furniture and contents be moved to the back of the house upon
20 inspection. The risk of snow weight adding more live load was an additional factor.
21 Emergency stabilization was needed immediately. Mr. Shawish and I recommended the
22 residence be underpinned, on at least a temporary emergency basis. The emergency
23 stabilization work included installation of eighteen (18) 2" diameter pin piles to support the
24 undermined foundation along the southern and eastern portions of the residence.
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1 5. Permanent repairs had to wait until Spring 2014. Peter Norris approved of our repair
2 plan consistent with our recommendations. These repairs required:

3 • The installation of a new shotcrete retaining wall, below the existing east
4 and south foundation wall, extending down to the new existing ground surface,
5 supported by the pin piles previously installed, and helical anchor tiebacks below the
6 home in a northwest direction.

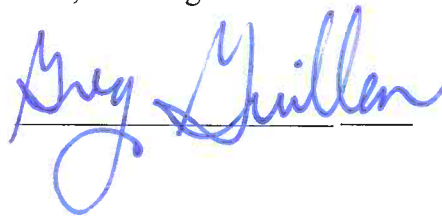
7 • The slab on grade was backfilled with geofoam blocks and pressurized grout.

8 These repairs are shown on a schematic, attached as Exhibit B.

9 6. The Nelson Engineering Report explains the slope below the residence was not stable
10 and set out recommendations for its restoration. The residence was stabilized because the
11 undermining critically diminished the function of the footings. Soil was not replaced below the
12 slab on ground at the southeast portion of the structure. This void was replaced by foam blocks
13 and lateral resistance for the new shotcrete wall was replaced by using helical anchors driven
14 into the soils below the home. The residence was stable once repaired, irrespective of whether
15 the downhill slope was restored.

16 I declare under penalties of perjury under the laws of the State of Washington that the
17 foregoing is true and correct.

18 Dated this day, November 20, 2015 at Edmonds, Washington.

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